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10 *of the State of California*

11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA
13 WESTERN DIVISION
14

15 **STEVEN RUPP; STEVEN**
16 **DEMBER; CHERYL JOHNSON;**
17 **MICHAEL JONES;**
18 **CHRISTOPHER SEIFERT;**
19 **ALFONSO VALENCIA; TROY**
20 **WILLIS; and CALIFORNIA RIFLE**
21 **& PISTOL ASSOCIATION,**
22 **INCORPORATED,**

23 Plaintiffs,

24 v.

25 **ROB BONTA, in his official capacity**
26 **as Attorney General of the State of**
27 **California; and DOES 1-10,**

28 Defendants.

Case No. 8:17-cv-00746-JLS-JDE

DECLARATION OF JOHN D.
ECHEVERRIA IN SUPPORT OF
DEFENDANT'S REPLY TO
PLAINTIFFS' OPPOSITION TO
DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT

Date: July 28, 2023
Time: 10:30 a.m.
Courtroom: 8A
Judge: Hon. Josephine L. Staton
Trial Date: None set
Action Filed: April 24, 2017

I, John D. Echeverria, hereby declare and state the following:

1. I am a Deputy Attorney General at the California Department of Justice and serve as counsel to Defendant Rob Bonta, in his official capacity as Attorney General of the State of California (“Defendant”), in the above-titled matter. I make this declaration in support of Defendant’s Reply to Plaintiffs’ Opposition to Defendant’s Motion for Summary Judgment. Unless otherwise stated, I have personal knowledge of the facts set forth herein and am competent to testify thereto.

2. In support of Defendant’s Motion for Summary Judgment, Dkt. 149, Defendant relied on Defendant’s Exhibits 1 through 46, filed previously in support of and in opposition to the prior motions for summary judgment. *See* Dkts. 76, 90.

3. In support of Defendant’s Motion for Summary Judgment, Defendant also submitted Defendant’s Exhibits 47 through 87. *See* Dkt. 151.

4. In support of Defendant’s Opposition to Plaintiffs’ Motion for Summary Judgment, Defendant submitted Defendant’s Exhibit 88 through 99. *See* Dkt. 153.

3. Attached hereto are true and accurate copies of the following additional exhibits, which Defendant relies on in support of the concurrently filed Defendant’s Reply to Plaintiffs’ Opposition to Defendant’s Motion for Summary Judgment:

Exhibit Number	Document Description	Page Number
100	Findings of Fact & Conclusions of Law, <i>Oregon Firearms Fed’n v. Kotek</i> , No. 2:22-cv-01815-IM (D. Or. July 14, 2023) (D. Or. Dkt. 252)	3312-3434
101	Associated Press, <i>Synagogue Shooter Struggled with Gun, Fled with 50 Bullets</i> , Apr. 30, 2019, https://tinyurl.com/mrxame2e	3435-3441
102	Tr. of Proceedings, <i>United States v. Earnest</i> , No. 3:19-CR-1850-AJB (S.D. Cal. Sept. 17, 2021)	3442-3461
103	Heather Hope, <i>Warrants Associated with Poway Synagogue Shooting Released</i> , CBS8.com, July 31, 2019, https://tinyurl.com/4vmnec9f (photo of rifle)	3462-3463

Exhibit Number	Document Description	Page Number
104	SKS Rifle, Small Arms Review, Oct. 12, 2022, https://tinyurl.com/4aeu5996	3464- 3481
105	<i>Testimony Taken by the Joint Select Committee to Inquire into the Conditions of Affairs in the Late Insurrectionary States: Florida</i> , 42d Cong., Rep. 22 (1872) (Ltr. from J. Q. D. to Hamilton, Sept. 30, 1869)	3482- 3488

I declare under penalty of perjury under the laws of the United States of
America that the foregoing is true and correct.

Executed on July 14, 2023, at San Francisco, California.

/s/ John D. Echeverria

John D. Echeverria
Deputy Attorney General